

COHEN & GREEN

October 17, 2022

Hon. Ona T. Wang
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Wang:

As the Court likely recalls, my firm, with co-counsel, represents Plaintiff in the case named above. As the Court directed at the initial conference, this letter is to provide information about Ms. Rodney's treating doctors for conflict purposes. Below are the medical institutions/facilities, along with the last name of the doctors (and some other providers), that provided Ms. Rodney with care (as of the last time we collected records):

- Mt. Sinai West: Rosenstadt; Kim
- CityMD: Strochkov; Verdirame; Polovenko; DeCesare; Woo
- NYC Health and Hospitals – Coney Island: Michael; Grinkina

On those conditions, then, the parties jointly ask that the Court enter an order: (1) adjourning the initial pre-trial conference (and related filing deadlines) *sine die* until resolution of Defendants' current motion; (2) staying discovery except for Doe-related matters for the same period; and (3) directing Defendants to identify the Doe Defendants described in the First Amended Complaint (*see, e.g.,* Dkt. No. 29 ¶¶ 12, 13, 33-34, 37-38, 53-54, 60-61) by October 28, 2022, and allowing Plaintiff to file a Second Amended Complaint joining those parties within 5 business days thereafter.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

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cc:

All relevant parties by electronic filing.